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5 Attorney for Debtors:
6 CHERELL MARIE HALLETT

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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 In re:

13 CHERELL MARIE HALLETT,
14
15 Debtors.

Case No.: 19-30956-HLB-13

CHAPTER 13

FIRST AMENDED APPLICATION TO
MODIFY CHAPTER 13 PLAN

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17 FIRST AMENDED APPLICATION TO MODIFY CHAPTER 13 PLAN
18

19 The debtor respectfully requests that the Court modify his Chapter 13 plan as follows:

- 20 1. With regard to the monthly payments those payments shall: **Be modified to all terms**
21 **pursuant to the attached model plan, see attached Exhibit "A".**
22 2. Debtor(s) reason(s) for requesting the modifications are: Debtor is no longer able to
23 maintain the mortgage payments and she is requesting time to sell the real property located at
24 1782 Revere Avenue, San Francisco, CA 94124.
25 3. Debtor is requesting for a Plan Modification to allow her time to sell the real property
26 located at 1782 Revere Avenue, San Francisco, CA 94124 and to lower her Chapter 13 Plan
27 payment to allow her to continue to address her remaining Debts until the real property is sold.
28 4. Debtor has retained Michele Pender of Engel & Volkers to sell the real property no later
than November 30, 2021, see attached Listing Agreement Exhibit B.

1 WHEREFORE, the debtor(s) request(s) that the Court Modify the Chapter 13 plan as set
2 forth as above.

3 I, Richard A. La Cava, attorney for the debtor named in the foregoing objection, declare
4 under penalty of perjury under the laws of the United States of America the foregoing is true and
5 correct.

6 Dated: July 26, 2021

/s/CHERELL MARIE HALLETT
Cherell Marie Hallett, Debtor

8 Dated: July 26, 2021

/s/Richard A. La Cava
Richard A. La Cava
Attorney at Law

1 PROOF OF SERVICE

2
3 I declare that:

4 I am employed in the City and County of San Francisco, State of California. I am not less
5 than 18 years of age and not a party to the within case. My business address is: 3814 24th Street,
6 Suite 202, San Francisco, CA 94114.

7 On July 26, 21 I Served the within
8 APPLICATION TO MODIFY CHAPTER 13 PLAN, Exhibit "A" Amended Chapter 13 plan,
9 Exhibit "B" List Agreement and Declaration of Debtor in support of Modification
10 On the parties in said cause by placing a true and correct copy thereof in an with the postage
11 thereon fully pre-paid, thereafter properly sealing said envelope and depositing it in the United
12 States Mail at San Francisco, California, addressed as follow(s):

13 David Burchard Chapter 13, Trustee Served VIA ECF Only
14 P. O. Box 8059
Foster City, CA 94404

15 The United States Trustee Served via ECF only
16 450 Golden Gate Ave, 5th Floor, Suite #05-0153
17 San Francisco CA 94102

18 **See Exhibit C service list attached hereto and incorporated herein in full by this reference**

19
20
21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct and that this declaration was executed at San Francisco, California.

23
24
25 Dated: July 26, 2021

26 /s/Richard A. La Cava
Richard A. La Cava
Attorney at Law